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# ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

**SPENCER NORMAN, KIEFER NORMAN,  
COURNEY NORMAN AND HELEN S. NORMAN**

VS.

**CAMDEN COUNTY, BRIAN D. FIENE, DWIGHT D. FRANKLIN,  
RICHARD B. DZIADOSZ, LARRY L. RUTHERFORD,  
AND JAMEE L. WATSON**

**Case No. 2:12-CV-04210-NKL**

**DEPOSITION OF MATTHEW SOUTHARD**

**JULY 2, 2013**

**Exhibit**

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**NATIONWIDE SCHEDULING**

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Page 5

1 (WHEREUPON, the deposition began at

2 1:32 p.m.)

3 MATTHEW L. SOUTHARD, being sworn, testified as

4 follows:

5 DIRECT EXAMINATION BY MR. HENSON:

6 Q. Sir, would you please state your full  
7 name and address for the record.

8 A. Matthew L. Southard, 16550 Highway C,  
9 Phillipsburg, Missouri.

10 Q. Mr. Southard, my name is Keith  
11 Henson. I introduced myself to you outside. We  
12 are here today to take your deposition in a lawsuit  
13 that is styled Norman, et al versus Camden County,  
14 et al, and I will tell you that I represent the  
15 Defendants, which would be Camden County, Missouri,  
16 Sheriff Dwight Franklin, Sergeant Brian Fiene,  
17 Deputy Richard Dziadosz, Deputy Jamee Watson and  
18 Deputy Larry Rutherford in this lawsuit.

19 Mr. Carnie who is here today and has introduced  
20 himself to you represents the Norman family in this  
21 lawsuit.

22 So you understand we're taking your  
23 deposition in that lawsuit?

24 A. Yes, I do.

25 Q. Are you appearing here today pursuant

1 Mid-County, they're also manned 24 hours, but  
2 they're both volunteer also.

3 Q. Are there times when both fire  
4 department and Camden County EMS will arrive on  
5 scenes?

6 A. Yes, most of the time.

7 Q. Do you know that night whether or not  
8 the fire department was called out?

9 A. I do not know.

10 Q. When you got to the scene that  
11 evening, it looks like you arrived at 5:01 a.m.; is  
12 that correct?

13 A. Yes.

14 Q. And you said that patient contact was  
15 at 5:02 --

16 A. Yes.

17 Q. -- a.m.; is that correct?

18 A. Right.

19 Q. Did you learn any additional  
20 information about this call as you were en route to  
21 the scene other than the Taser had been deployed?

22 A. No, I didn't, not -- not that I can  
23 recollect.

24 Q. All right. And there's nothing  
25 contained in the report that indicates you learned

Page 77

1                   And I'm sure you've been through this  
2 before, but we don't care what you do. If you want  
3 to read it and sign it, that's fine. If you want  
4 to waive your right to read and sign, which is what  
5 most people do, that's fine, too.

6                   THE WITNESS: I'll waive it. That's  
7 fine.

8                   (SIGNATURE WAIVED.)

9                   (WHEREUPON, the deposition concluded  
10 at 2:54 p.m.)

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